

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

ROBERT S. LARSEN, ESQ.
Nevada Bar No. 7785
RACHEL L. WISE, ESQ.
Nevada Bar No. 12303
GORDON REES SCULLY MANSUKHANI, LLP
300 So. 4th Street, Suite 1550
Las Vegas, Nevada 89101
Telephone: (702) 577-9300
Facsimile: (702) 255-2858
E-Mail: rlarsen@grsm.com
rwise@grsm.com

Attorneys for S.L. Investments

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HOLLY MARIE WOOD, an individual,

Plaintiff,

vs.

CARL'S JR., operated and owned by BTO
INVESTMENTS, a Delaware corporation; S. L.
INVESTMENTS, a Nevada corporation; CKE
RESTAURANTS, INC., a Delaware corporation;
CARL'S J. RESTAURANTS, LLC, a foreign limited
liability company; CARL KARCHER
ENERPRISES, INC. a foreign corporation; CKE
RESTAURANTS HOLDINGS, INC., a foreign
corporation; RUCHEY MOLINA CRUZ, an
individual; DOES 1 through 10, inclusive; ROE
CORPORATIONS/ENTITIES 1 through 10,
inclusive,

Defendants.

Case No.: 2:20-cv-02329-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF S.L. INVESTMENT'S
MOTION FOR SANCTIONS
(FIRST REQUEST)**

In accordance with Local Rules 6-1 and 7-1, Plaintiff Holly Marie Wood and Defendant S.L. Investments, Inc. by and through their respective attorneys of record, stipulate as follows:

1. On August 3, 2021, Defendant S.L. Investments, Inc. filed the Motion for Sanctions [ECF No. 50].
2. Plaintiff filed her Opposition to Defendant S.L. Investments, Inc.'s Motion for FRCP 11 Sanctions on October 25, 2021 [ECF No. 61].
3. The Parties stipulate and agree that Defendant S.L. Investments may file the reply

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1 in support of the Motion for Sanctions on or before **November 8, 2021**.

2 In Support of this Stipulation, the Parties agree to the following:

3 1. Good cause exists to support this request for additional time. Defendant's counsel
4 has been diligently working on a reply to the pending opposition, but due to recent circumstances
5 will not be able to timely complete a response. Due to time commitments involving other cases
6 and a medical matter, Defendant's counsel has not been able to dedicate the time necessary for
7 completing and filing an appropriate reply. Due to an outpatient procedure on October 27, 2021,
8 Defendant's counsel was unable to perform sufficient work on any of her cases, including this
9 one. Additionally, during the past week, Defendant's counsel has worked on propounding
10 discovery, drafting objections and cross-examination to multiple depositions by written question,
11 preparing for upcoming depositions, and performing due diligence relevant to opinion matters.

12 2. An additional week will provide the undersigned counsel sufficient time to
13 finalize and file a reply to the pending opposition.

14 3. The undersigned counsel conferred with Plaintiffs' counsel and Plaintiffs do not
15 oppose the extension request.

16 4. This stipulation is not made for purposes of delay.

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1 5. Therefore, the parties agree that S.L. Investments, Inc.'s Reply in support of the
2 Motions to Sanction is now due on or before **November 8, 2021**.

3 The Parties respectfully request that the court approve this Stipulation.

4 DATED this 29th day of October, 2021.

 DATED this 29th day of October, 2021.

5 PAUL PADDA LAW PLLC

 GORDON REES SCULLY
 MANSUKHANI, LLP

6 _____
7 /s/ Paul S. Padda

 /s/ Rachel L. Wise

8 Paul S. Padda, Esq.
9 Tony L. Abbatangelo, Esq.
 4030 S. Jones Blvd., Unit 30370
 Las Vegas, NV 89173
 psp@paulpaddalaw.com
10 tony@paulpaddalaw.com

 Robert S. Larsen, Esq.
 Nevada Bar No. 7785
 Rachel L. Wise, Esq.
 Nevada Bar No. 12303
 300 So. 4th Street, Suite 1550
 Las Vegas, Nevada 89101

11 Attorneys for Plaintiff

 Attorneys for S.L. Investments

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14 **IT IS SO ORDERED**

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16 UNITED STATES DISTRICT JUDGE

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18 **DATED:** November 2, 2021
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